

Exhibit “i”

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1 COMP

2 KRISTOPHER M. HELMICK, ESQ.

3 Nevada Bar No.: 13348

4 **RICHARD HARRIS LAW FIRM**

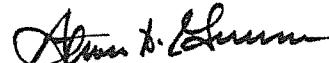
5 801 South Fourth Street

6 Las Vegas, Nevada 89101

7 Phone: (702) 444-4444

8 E-Mail: khelmick@RichardHarrisLaw.com

9 *Attorneys for Plaintiff*



CLERK OF THE COURT

7 **DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

10 MIRIAM LEON,

11 Plaintiff,

12 vs.

13 BODEGA LATINA CORPORATION, d/b/a EL
14 SUPER, a Foreign Corporation; DOES 1 through
15 20; ROE BUSINESS ENTITIES 1 through 20,
inclusive jointly and severally,

16 Defendants,

17 CASE NO.: A - 1 7 - 7 5 3 9 8 9 - C

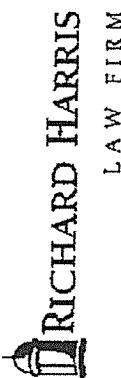
18 DEPT. NO.: XXVI

19 **COMPLAINT**

20 COMES NOW, Plaintiff MIRIAM LEON, by and through her Attorney,
21 KRISTOPHER M. HELMICK, ESQ., of the RICHARD HARRIS LAW FIRM, and for
22 her causes of action against Defendants, and each of them, complains and alleges as
23 follows:

24 **JURISDICTION AND PARTIES**

25 1. That Plaintiff MIRIAM LEON (hereinafter "Plaintiff") is, and at all times
26 mentioned herein was, a resident of the County of Clark, State of Nevada.
27 2. That according to information and belief, and at all times relevant herein,
28



1 Defendant BODEGA LATINA CORPORATION, d/b/a EL SUPER is, and was, a
2 Foreign Corporation, licensed to do business in Clark County, Nevada.

3 3. All the facts and circumstances that gave rise to the subject lawsuit
4 occurred in Clark County, Nevada.

5 4. That Defendant DOES 1-5 and ROE BUSINESS ENTITIES 1-5 are other
6 owners of the property known as El Super (hereinafter "the Property").

8 5. That Defendant DOES 6-10 and ROE BUSINESS ENTITIES 6-10 are the
9 managers of the Property.

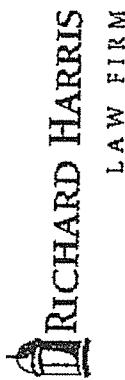
10 6. That Defendants DOES 11-15 and ROE BUSINESS ENTITIES 11-15 are
11 the maintenance providers for the Property.

13 7. That the true names and capacities of the Defendants designated herein as
14 Doe or Roe Business entities are presently unknown to Plaintiff at this time, including
15 owners associations presently unknown and the distributor of the Products at issue in this
16 Complaint. Therefore, Plaintiff sues said Defendants by fictitious names. When the true
17 names and capacities of these defendants are ascertained, Plaintiff will amend this
18 Complaint accordingly.

20 8. That at all times pertinent, Defendants were agents, servants, employees or
21 joint venturers of every other Defendant herein, and at all times mentioned herein were
22 acting within the scope and course of said agency, employment, or joint venture, with
23 knowledge and permission and consent of all other named Defendants.

25 **FACTS COMMON TO ALL CAUSES OF ACTION**

27 9. On or about October 5, 2016, in Clark County, Nevada, Plaintiff was an
28 invitee on the Property.



10. That on or about October 5, 2016, Plaintiff was injured when slipped and fell due to a slippery substance being on the floor which created an unsafe and dangerous condition on the Property (hereinafter referred to as the "dangerous condition").

11. Upon information and belief, the dangerous condition was caused as a direct result of the Defendants' failure to design, construct, control, supervise, repair, and/or maintain the Property in a reasonable and safe manner.

12. Defendants maintained and were in control of the Property.

13. Defendants knew, or reasonably should have known, that the dangerous condition existed on or about the Property.

14. Defendants failed to place signs, caution, warn, or otherwise make safe, the dangerous condition existing on or about the Property. Accordingly, Defendants negligently, carelessly, and recklessly maintained and allowed the dangerous condition to exist.

15. Defendants should have warned or otherwise made safe the dangerous condition because that condition was non-obvious to Plaintiff.

FIRST CLAIM FOR RELIEF (NEGLIGENCE)

16. Plaintiff incorporates paragraphs 1 through 15 of the Complaint as if those paragraphs were fully incorporated and set forth herein.

17. Defendants owed Plaintiff a duty of care to warn Plaintiff of the non-obvious and dangerous condition.

18. Defendants breached this duty of care by failing to place caution signs, or otherwise failing to warn Plaintiff of the dangerous, non-obvious condition.

11

19. Defendants' negligence directly and proximately caused Plaintiff serious injury.

20. As a direct and proximate result of Defendants' negligence, Plaintiff received medical and other treatments for injuries sustained to body, limbs, organs and nervous systems, all or some of which conditions may be permanent and disabling and, all to Plaintiff's damage in a sum in excess of \$15,000.00. That said services, care, and treatment are continuing and shall continue in the future.

21. As a direct and proximate result of Defendants' negligence, Plaintiff has been required to and has limited certain occupational and recreational activities, which have caused, and shall continue,

22. As a direct and proximate result of Defendants' negligence, Plaintiff has been required to engage the services of an attorney, incurring attorney's fees and costs to bring this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, expressly reserving the right to amend this Complaint prior to or at the time of trial of this action to insert those items of damage not yet fully ascertainable, prays judgment against the Defendants, and each of them, as follows:

1. General damages sustained by Plaintiff in an amount in excess of \$15,000.00;
2. Special damages to be determined at the time of trial;
3. Medical and incidental expenses already incurred and to be incurred;
4. Reasonable attorney's fees and costs of suit;

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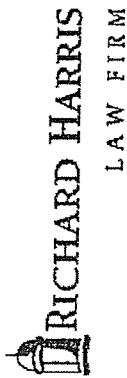
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5. Interest at the statutory rate; and
6. For such other relief as the Court deems just and proper.

7.
Dated this 14th day of April, 2017.

RICHARD HARRIS LAW FIRM

KRISTOPHER M. HELMICK, ESQ.
Nevada Bar No. 13348
801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff



DISTRICT COURT CIVIL COVER SHEET

A - 1 7 - 7 5 3 9 8 9 - C

County, Nevada

X X V I

Case No.

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): Miriam Leon	Defendant(s) (name/address/phone): Bodega Latina Corporation d/b/a El Super
Attorney (name/address/phone): Kristopher M. Helmick, Esq. Richard Harris Law Firm 801 South 4th Street Las Vegas, NV 89101	Attorney (name/address/phone):

II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property	Torts	
Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input checked="" type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate <small>(select case type and estate value)</small> <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant	<input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

*Business Court filings should be filed using the Business Court civil coversheet.**4/14/17*

Date

[Signature]

Signature of initiating party or representative

See other side for family-related case filings.